

# Exhibit 1

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May 23, 2022

*Via E-Mail*

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**Re: *Chen, et al. v. Target Corp.*, 21-cv-1247 (D. Minn.) – Invitation to Mediate**

Dear Counsel,

In his ruling regarding Target's motion to dismiss, Judge Frank strongly encouraged the parties to engage in settlement discussions. Plaintiffs believe that mediated settlement discussions would be most productive. If Target is willing to participate in such discussions, we would be happy to exchange proposals regarding timing and potential mediators to assist with those negotiations.

Please let us know your thoughts as soon as possible.

Sincerely,

**THE MILLER LAW FIRM, P.C.,**

Sharon S. Almonrode

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